

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA**

DIANA MEY,)
Individually and on)
behalf of a proposed class,)
)
Plaintiff,)
)
v.)
)
ALL ACCESS TELECOM, INC.,)
BANDWIDTH INC.,)
CENTURYLINK COMMUNICATIONS.,)
LLC, d/b/a Lumen Technologies,)
LEVEL 3 COMMUNICATIONS, LLC,)
d/b/a Lumen Technologies,)
INTELIQUENT, INC.;)
NOS COMMUNICATIONS, INC., and)
TELIAX, INC.)
)
Defendants.)

Case No.: 5:19-CV-00237-JPB

**JOINT STIPULATION EXTENDING TIME FOR DEFENDANTS CENTURYLINK
COMMUNICATIONS, LLC AND LEVEL 3 COMMUNICATIONS, LLC TO FILE A
MOTION TO COMPEL REGARDING PLAINTIFF’S DISCOVERY RESPONSES**

PLEASE TAKE NOTICE that Plaintiff and Defendants CenturyLink Communications, LLC and Level 3 Communications, LLC (“Lumen”), through their below counsel, hereby stipulate and agree to extend the time for Lumen to file a Motion to Compel regarding Plaintiff’s responses to Lumen’s first set of discovery requests.

1. Plaintiff served answers and responses to Lumen’s First Set of Interrogatories and Requests for the Production of Documents on December 17, 2021.

2. Under Local Rule 37.02(b), Lumen has 30 days after service of the discovery responses to file a Motion to Compel regarding Plaintiff’s discovery responses.

3. Counsel for Plaintiff and Lumen plan to meet and confer regarding Plaintiff’s responses to Lumen’s first set of discovery requests.

4. The parties stipulate and agree that Lumen shall have until February 14, 2022, to file a Motion to Compel regarding Plaintiff's responses to Lumen's first set of discovery requests. The parties further stipulate that Plaintiff will have until February 28, 2022 to file an opposition in response to a Motion to Compel filed by Lumen.

Respectfully submitted,

<p><u>/s/ John W. Barrett</u> John W. Barrett (WV Bar No. 7289) Jonathan R. Marshall (WV Bar No. 10580) Benjamin J. Hogan (WV Bar No. 12997) BAILEY & GLASSER LLP 209 Capitol Street Charleston, WV 25301 Telephone: 304-345-6555 Facsimile: 304-342-1110 JBarrett@baileyglasser.com JMarshall@baileyglasser.com BHogan@baileyglasser.com William Howard (admitted pro hac vice)</p> <p>THE CONSUMER PROTECTION FIRM 401 East Jackson Street, Suite 2340 SunTrust Financial Center Tampa, FL 33602 Telephone: 813-500-1500 Facsimile: 813-435-2369 Billy@TheConsumerProtectionFirm.com Yvette Golan (admitted pro hac vice)</p> <p>THE GOLAN FIRM 2000 M Street NW, Suite 750-A Washington, DC 20036 Telephone: 866-298-4150 ext. 101 Facsimile: 928-441-8250 YGolan@tgfirm.com</p> <p>Counsel for Plaintiff</p>	<p><u>/s/ Stuart A. McMillan</u> Stuart A. McMillan (WVSB #6352) Bowles Rice LLP 600 Quarrier Street Charleston, WV 25301 Phone: (304) 347-1110 Fax: (304) 347-1746 smcmillan@bowlesrice.com</p> <p>Russell S. Jones, Jr. (admitted <i>pro hac vice</i>) Robert V. Spake, Jr. (admitted <i>pro hac vice</i>) Elizabeth Marden (admitted <i>pro hac vice</i>) POL SINELLI PC 900 W. 48th Place, Suite 900 Kansas City, MO 64112 Telephone: (816) 753-1000 rjones@polsinelli.com rspake@polsinelli.com lmarden@polsinelli.com</p> <p><i>Attorneys for Defendants CenturyLink Communications, LLC and Level 3 Communications, LLC</i></p>
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Defendants)

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the **17th day of January, 2022**, I filed a ***“Joint Stipulation Extending Time for Defendants Centurylink Communications, LLC and Level 3 Communications, LLC to File a Motion to Compel Regarding Plaintiff’s Discovery Responses”*** via the Court’s CM/ECF system, which will send notification of such filing to all CM/ECF participants in this action.

/s/ Stuart A. McMillan
Stuart A. McMillan (WVSB #6352)